

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
LAFAYETTE DIVISION**

**MANUEL VEGA REYES**

**DOCKET NO. 6:22-cv-05685**

**VERSUS**

**JUDGE DAVID C. JOSEPH**

**ALPINE TRANSPORTATION  
INSURANCE RISK RETENTION GROUP  
INC., CAMAS CARRIER, LLC and  
RENILDO MARQUEZ**

**MAGISTRATE JUDGE CAROL B.  
WHITEHURST**

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**STIPULATIONS**

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**NOW INTO COURT**, through undersigned counsel, comes Plaintiff, Manuel Vega Reyes, and Defendants, Alpine Transportation Insurance Risk Retention Group, Inc., Camas Carrier, LLC, and Renildo Marquez (“Defendants”), who hereby stipulate to the following:

**1.**

The subject accident was caused solely and proximately by the negligence and/or fault of Renildo Marquez.

**2.**

Manuel Vega Reyes, was not at fault in the subject accident.

**3.**

The parties further jointly stipulate to the authenticity of Plaintiff, Manuel Vega Reyes’ medical records concerning medical treatment received from the following medical providers: Dr. Adam Mecham/Laredo Spine Medical Center, Dr. Gerardo Zavala, E-C DME, LLC, Doctor’s Hospital of Laredo, Open MRI Del Norte, and Webb Emergency Medicine Associates.

4

Defendants reserve their right to challenge causation for and the extent of, the Plaintiff, Manuel Vega Reyes' injuries and damages, if any.

5.

Defendants further reserve their right to challenge the admissibility of the Plaintiff, Manuel Vega Reyes' medical records.

6.

The parties further jointly stipulate to the authenticity and admissibility of the Plaintiff, Manuel Vega Reyes' deposition transcript to be read to and provided to the Jury.

7.

The parties further jointly stipulate to the authenticity and admissibility of the Breaux Bridge Police Department Incident Report Complaint #: 21-000527 of this accident dated July 16, 2021, to be provided to the jury.

8.

The parties further jointly stipulate to the authenticity and admissibility of the Alpine Transportation Insurance Risk Retention Group, Inc. policy number ALP001658 in effect on the date of loss, July 16, 2021.

Respectfully Submitted:

DEGAN BLANCHARD & NASH

/s/ Janna Campbell Underhill

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~And~

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**AND**

**CARL J. RACHAL, APLC**

/s/ Carl J. Rachal

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***Counsel for Plaintiff, Manuel Vega Reyes***

**CERTIFICATE OF SERVICE**

I hereby certify that on this the 15<sup>th</sup> day of December 2024 I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send a notice of electronic filing to all counsel of record.

/s/ Janna Campbell Underhill

Janna Campbell Underhill